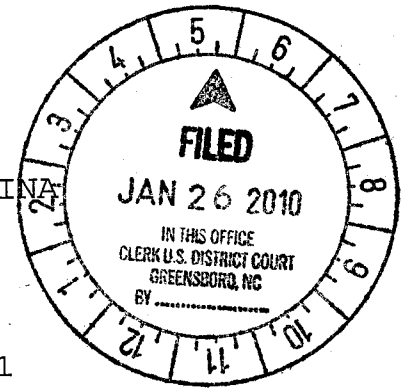


IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA



UNITED STATES OF AMERICA :

v. :

1:10CR 32 -1

ROBIN SNIPES PERRY :

The Grand Jury charges:

COUNT ONE

1. At all times material herein, ROBIN SNIPES PERRY was a resident of Durham County in the Middle District of North Carolina.

2. At all times material herein, Becton, Dickinson & Company ("BDC") was a corporation doing business in Research Triangle Park, in the Middle District of North Carolina. BDC provides medical products and services to the health care and medical research industry.

3. At all times material herein, American Express Travel Related Services Company ("American Express") was in the business of providing financial products and services, including credit cards, gift cards and gift checks.

4. At all times material herein, American Express maintained a place of business in Salt Lake City, Utah, which facility processed gift check and gift card orders.

5. At all times material herein, BDC provided recognition awards to its employees. BDC purchased American Express gift cards and gift checks to present to employees as recognition awards.

6. At all times material herein, ROBIN SNIPES PERRY was employed by BDC as an Administrative Coordinator for the company's cell and tissue information technology functional units in Research Triangle Park. ROBIN SNIPES PERRY's responsibilities included ordering American Express gift cards and checks when authorized by BDC for use as employee recognition awards. ROBIN SNIPES PERRY was not authorized to order, receive or use, American Express gift cards or gift checks for her own personal use or purpose.

SCHEME AND ARTIFICE TO DEFRAUD

7. From on or about September 15, 2003, to on or about January 30, 2006, the exact dates to the Grand Jurors unknown, in the County of Durham, in the Middle District of North Carolina, ROBIN SNIPES PERRY did devise and intend to devise a scheme and artifice to defraud BDC of \$176,425.00 in cash by wrongfully and without authorization ordering, receiving and converting to her own use, American Express Gift Checks, which checks were purchased with funds belonging to BDC and which

were purchased and converted by ROBIN SNIPES PERRY without the knowledge or consent of BDC.

8. It was a part of the scheme and artifice to defraud that ROBIN SNIPES PERRY, without authority, and in excess of authority from BDC, prepared American Express Gift Check Corporate order forms ordering gift checks in various denominations, such orders to be paid for with BDC corporate funds.

9. It was further a part of the scheme and artifice to defraud that ROBIN SNIPES PERRY directed on the order form that American Express send the ordered gift checks by express mail or commercial interstate carrier to her attention at the offices of BDC in Research Triangle Park.

10. It was further a part of the scheme and artifice to defraud that ROBIN SNIPES PERRY executed and signed the order forms as Admin Coordinator for BDC as if she had authority to order the American Express Gift Checks on behalf of BDC.

11. It was further a part of the scheme and artifice to defraud that ROBIN SNIPES PERRY transmitted, and caused to be transmitted, the order forms from the offices of BDC in Research Triangle Park, to the offices of American Express in

Salt Lake City, Utah, by fax transmission. A copy of the order form was also sent by United States Mail.

12. It was further a part of the scheme and artifice to defraud that ROBIN SNIPES PERRY received the fraudulently ordered American Express gift checks at the offices of BDC in Research Triangle Park and converted them to her own use by making the gift checks payable to cash or to a business and then countersigned the checks in her own name.

13. It was further a part of the scheme and artifice to defraud that ROBIN SNIPES PERRY obtained cash or goods in the amount of \$176,425.00 through the unauthorized use and conversion of American Express Gift checks.

#### EXECUTION

14. On or about April 20, 2005, in the County of Durham, in the Middle District of North Carolina, ROBIN PERRY SNIPES, for the purpose of executing the aforesaid scheme and artifice to defraud, and attempting to do so, knowingly caused to be delivered by United States Mail and by commercial interstate carrier according to the directions thereon, a package addressed to Robin Snipes Perry, 21 Davis Drive, P.O. Box 12016, Research Triangle Park, North Carolina, containing

twenty-five \$50.00 dollar American Express Gift Checks and fifty \$100.00 American Express Gift Checks.

All in violation of Title 18, United States Code, Section 1341.

COUNT TWO

1. The Grand Jury realleges and incorporates herein by reference paragraphs 1 through 13 of Count One as if fully referenced herein.

2. On or about May 11, 2005, in the County of Durham, in the Middle District of North Carolina, ROBIN PERRY SNIPES, for the purpose of executing the aforesaid scheme and artifice to defraud, and attempting to do so, knowingly caused to be delivered by United States Mail and by commercial interstate carrier according to the directions thereon, a package addressed to Robin Snipes Perry, 21 Davis Drive, P.O. Box 12016, Research Triangle Park, North Carolina, containing fifty \$50.00 American Express Gift Checks and fifty \$100.00 American Express Gift Checks; in violation of Title 18, United States Code, Section 1341.

### COUNT THREE

1. The Grand Jury realleges and incorporates herein by reference paragraphs 1 through 13 of Count One as if fully referenced herein.

2. On or about August 2, 2005, in the County of Durham, in the Middle District of North Carolina, ROBIN PERRY SNIPES, for the purpose of executing the aforesaid scheme and artifice to defraud, and attempting to do so, knowingly caused to be delivered by United States Mail and by commercial interstate carrier according to the directions thereon, a package addressed to Robin Snipes Perry, 21 Davis Drive, P.O. Box 12016, Research Triangle Park, North Carolina, containing twenty-five \$50.00 American Express Gift Checks and seventy-five \$100.00 American Express Gift Checks; in violation of Title 18, United States Code, Section 1341.

### COUNT FOUR

1. The Grand Jury realleges and incorporates herein by reference paragraphs 1 through 13 of Count One as if fully referenced herein.

2. On or about August 31, 2005, in the County of Durham, in the Middle District of North Carolina, ROBIN PERRY SNIPES, for the purpose of executing the aforesaid scheme and artifice to defraud, and attempting to do so, knowingly caused to be

delivered by United States Mail and by commercial interstate carrier according to the directions thereon, a package addressed to Robin Snipes Perry, 21 Davis Drive, P.O. Box 12016, Research Triangle Park, North Carolina, containing twenty-five \$50.00 American Express Gift Checks and seventy-five \$100.00 American Express Gift Checks; in violation of Title 18, United States Code, Section 1341.

COUNT FIVE

1. The Grand Jury realleges and incorporates herein by reference paragraphs 1 through 13 of Count One as if fully referenced herein.

2. On or about December 2, 2005, in the County of Durham, in the Middle District of North Carolina, ROBIN PERRY SNIPES, for the purpose of executing the aforesaid scheme and artifice to defraud, and attempting to do so, knowingly caused to be delivered by United States Mail and by commercial interstate carrier according to the directions thereon, a package addressed to Robin Snipes Perry, 21 Davis Drive, P.O. Box 12016, Research Triangle Park, North Carolina, containing thirty \$50.00 American Express Gift Checks and eighty \$100.00 American Express Gift Checks; in violation of Title 18, United States Code, Section 1341.

COUNT SIX

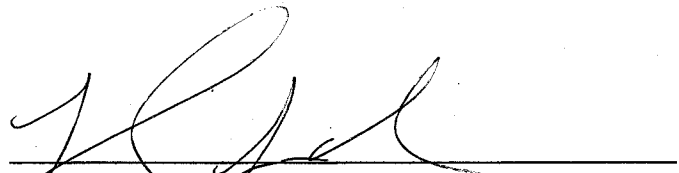
1. The Grand Jury realleges and incorporates herein by reference paragraphs 1 through 13 of Count One as if fully referenced herein.


2. On or about January 19, 2006, in the County of Durham, in the Middle District of North Carolina, ROBIN PERRY SNIPES, for the purpose of executing the aforesaid scheme and artifice to defraud, and attempting to do so, knowingly caused to be delivered by United States Mail and by commercial interstate carrier according to the directions thereon, a package addressed to Robin Snipes Perry, 21 Davis Drive, P.O. Box 12016, Research Triangle Park, North Carolina, containing

twenty-five \$50.00 American Express Gift Checks and eighty  
\$100.00 American Express Gift Checks; in violation of Title  
18, United States Code, Section 1341.

A TRUE BILL:

\_\_\_\_\_  
FOREPERSON

  
\_\_\_\_\_  
FRANK J. CHUT, JR.  
ASSISTANT UNITED STATES ATTORNEY

  
\_\_\_\_\_  
ANNA MILLS WAGONER  
UNITED STATES ATTORNEY